CAP 980 636 682 *

ANNUAL DOCUMENT LOG
FOR
THE HANDLING & DISPOSAL
OF
PCB CONTAMINATED
MATERIALS

CALENDAR 2003

San Diego Gas & Electric Kearny PCB Facility 5488 Overland Avenue San Diego, CA 92123

EPA ID# CAD980636682

This Annual Document Log is prepared pursuant to 40 CFR 761.180

ANNUAL DOCUMENT LOG SUMMARY INFORMATION For CALENDAR YEAR 2003

| CATEGORY | Total Number | Total Weight (kg) | PCB Waste (kg) |
|------------------------------|-----------------|-------------------------|----------------------|
| PCB Transformers (≥ 500 ppm) | 77 | 11,170 | 11,170 |
| PCB Capacitors (≥ 500 ppm) | 5 | 142 | 142 |
| Bulk PCB Articles (≥ 50 ppm) | | 149,691 | 149,691 |
| PCB Articles (> 50 ppm) | | 418 | 418 |
| PCB Containers (≥ 50 ppm) | | | |

ITEMS REMAINING IN SERVICE

| • | Total Number of PCB Transformers (≥500 ppm) | . <u>3</u> |
|---|--|------------|
| • | Total Weight of PCBs in PCB Transformers (kg) | <u>974</u> |
| • | Total Number of Large PCB Capacitors | 1 |
| • | Total Weight (kg) of PCBs and PCB Items in PCB | |
| | Containers (> 50ppm) | 76 |

MANIFEST NUMBERS

(generated by the company during the calendar year)

See attached "Hazardous Waste Follow Up Report – SDG&E Kearny PCB Facility"

HAZARDOUS WASTE FOLLOW UP REPORT - SDG&E KEARNY PCB FACILITY

| Manifest No. | 01 - 5 / | | Document | Received | CERTIFICATE OF DESTRUCTION | | | | | |
|-----------------|-----------|---------|----------|-----------|----------------------------|-----------|------------|-----------|------------|-----------|
| Manifest Number | Ship Date | Sent To | Number | Date | Number | Date | Number | Date | Number | Date |
| 21788269 | 1/13/2003 | APU | 30001 | 1/14/2003 | 179381 | 1/18/2003 | | | | |
| 21788270 | 1/9/2003 | TCI | 30002 | 1/14/2003 | 230050 | | | | | |
| 21788279 | 1/23/2003 | APU | 30003 | 1/20/2003 | 181981 | 2/25/2003 | | ···· | | |
| 21788285 | 2/13/2003 | KHL | 30005 | 2/18/2003 | 2178828501 | 3/3/2003 | | | | |
| 21788288 | 2/20/2003 | TCI | 30008 | 2/25/2003 | 230261 | 3/18/2003 | | 3/21/2003 | | |
| 21788290 | 2/20/2003 | TCI | 30010 | 2/25/2003 | 230263 | 4/18/2003 | | | | |
| 22453654 | 3/17/2003 | APU | 30014 | 3/28/2003 | 183238 | 4/8/2003 | | | | |
| 22453656 | 3/19/2003 | APU | 30015 | 3/20/2003 | 182694 | 3/30/2003 | | | | |
| 22453658 | 3/27/2003 | TCI | 30016 | 3/31/2003 | 230417 | 6/16/2003 | ~ | | | |
| 22453663 | 3/27/2003 | TCI | 30018 | 3/31/2003 | 230415 | 4/14/2003 | | | | |
| 22453668 | 4/25/2003 | KHL | 30023 | 4/28/2003 | 2245366801 | 5/15/2003 | 2245366802 | 5/15/2003 | 2245366803 | 5/15/2003 |
| 22453671 | 5/12/2003 | TCI | 30028 | 5/16/2003 | 230654 | 6/29/2003 | | | | 0/10/2000 |
| 22453672 | 5/12/2003 | TCI | 30029 | 5/16/2003 | 230653 | 5/28/2003 | | | | |
| 22453673 | 5/15/2003 | APU | 30030 | 5/16/2003 | 185228 | 5/25/2003 | | | | |
| 22453674 | 5/19/2003 | APU | 30031 | 5/30/2003 | 186246 | 6/19/2003 | | | | |
| 22453676 | 5/22/2003 | TCI | 30032 | 5/27/2003 | 230701 | 8/4/2003 | | | | |
| 22453677 | 5/22/2003 | TCI | 30033 | 5/27/2003 | 230702 | 6/13/2003 | | | | |
| 22453678 | 5/22/2003 | TCI | 30034 | 5/27/2003 | 230703 | 6/16/2003 | | | | |
| 22453679 | 5/29/2003 | TCI | 30036 | 6/2/2003 | 230741 | 6/6/2003 | | | | |
| 22453680 | 5/29/2003 | TCI | 30037 | 6/2/2003 | 230740 | 6/5/2003 | 230742 | 6/16/2003 | | |
| 22453681 | 6/2/2003 | TCI | 30038 | 6/9/2003 | 230801 | 7/1/2003 | | | | |
| 22453682 | 6/2/2003 | TCI | 30039 | 6/9/2003 | 230800 | 7/2/2003 | | | | |
| 22453699 | 6/25/2003 | TCI | 30044 | 7/1/2003 | 230897 | 8/4/2003 | | | | |

PCB ANNUAL DOCUMENT LOG - SDG&E KEARNY PCB FACILITY

| Manifest Number | Ship Date | Sent To | Document Number | Received Date | CERTIFICATE OF DESTRUCTION | | | | | |
|-----------------|------------|---------|--------------------|------------------|----------------------------|------------|--------|------------|--------|----------|
| | | | | | Number | Date | Number | Date | Number | Date |
| 22453707 | 7/18/2003 | KHL | 30047 | 7/21/2003 | 2245370701 | 7/30/2003 | | | | |
| 22768807 | 9/18/2003 | TCI | 30057 | 9/22/2003 | | 10/31/2003 | | | | <u> </u> |
| 22768809 | 9/18/2003 | TCI | 30058 | 9/23/2003 | | | | | | |
| 22768810 | 9/18/2003 | TCI | 30059 | 9/22/2003 | | | | 10/31/2003 | | |
| 22768813 | 9/29/2003 | TCI | 30062 | 10/6/2003 | | 10/16/2003 | | 10/01/2000 | | |
| 22768814 | 9/29/2003 | TCI | 30063 | 10/6/2003 | | 10/31/2003 | | | | |
| 22768820 | 10/30/2003 | KHL | 30067 | 11/5/2003 | 2276882001 | <u> </u> | | | | |
| 22768823 | 11/17/2003 | APU | 30070 | 11/21/2003 | | | | | | |
| 22768824 | 12/3/2003 | APU | 30071 | 12/5/2003 | 196294 | | | | | |
| 22768828 | 12/15/2003 | TCI | 30073 | 12/19/2003 | 231857 | | | | | |
| | | | | | | | | | | |
| 21788264 | 12/5/2002 | TCI | 20063 | 12/10/2002 | 221764 | 1/31/2003 | | | | |
| 21788265 | 12/5/2002 | TCI | 20064 | 12/9/2002 | 221762 | 1/29/2003 | | | | |
| 21788266 | 12/5/2002 | TCI | 20065 | 12/10/2002 | 221765 | | | | | |
| 21788267 | 12/19/2002 | KHL | 20067 | 12/31/2002 | 2178826701 | | | | | |
| | | | | 7 | | | | | | |
| | | | | | | | | | | |

APU = Clean Harbors, 11600 North Aptus Road, Aragonite, Utah 84029

KHL = Chemical Waste Management, 35251 Old Skyline Road, Kettleman City, CA 93239

TCI = Trans-Cycle Industries Inc., 101 Parkway East, Pell City, Alabama 35125

PCB SELF-INSPECTION CHECKLIST

1. Previous Inspections

If you have had previous PCB inspections, are inspection records on file and have you corrected all deficiencies that were noted in

the inspections? Yes

Date of PCB Inspections: January 2003 – see PCB Office

Date deficiencies corrected: Not Applicable

2. Recordkeeping

Are the following records accurate, up-to-date, legible, and available for inspection?

| 40 CFR 761.180 | Yes |
|----------------|---|
| 40 CFR 761.180 | Yes |
| 40 CFR 761.205 | Yes |
| 40 CFR 761.218 | Yes |
| 40 CFR 761.30 | Yes |
| 40 CFR 761.125 | Yes |
| | 40 CFR 761.180 40 CFR 761.205 40 CFR 761.218 40 CFR 761.30 |

3. Marking & Labeling

Are all PCB Transformers, PCB Storage Facilities, PCB Access Areas, and PCB Containers properly marked with a ML or MS label (40 CFR 761.40 and 761.45)?

Yes

Do the items being sent for disposal have California Hazardous Waste labels (22 CCR 66262.34 and 66262.32)? **Yes**

4. Storage

One of the more complex and confusing areas of PCB regulations has to do with the storage of PCB wastes. The complexity is due to the interplay between federal and California state regulations. The information presented below on storage of PCB wastes (not items for reuse) will address two issues: time and physical storage criteria.

Are your PCB wastes stored in compliance with the time frames as listed below?

Yes

Storage Time Involved

30 Days or Less

No special federal or California state permits or storage areas required.

More Than 30 Days But Less Than 90 Days

Federal regulations require a special PCB Storage Area if you are storing PCB items for more than 30 days. The PCB Storage Area will allow for storage of PCB waste for one year. The one-year also includes the time for disposal of the PCB wastes (40 CFR 761.165).

More Than 90 Days But Less Than One Year

California regulations require a hazardous waste facility permit or variance if storing hazardous PCB wastes for more than 90 days. Please note: even if a company has a location that meets the federal requirements for a PCB Storage Area, you would still need a California Hazardous Waste Facility permit or variance to store PCB wastes for more than 90 days (22 CCR 66262.34).

More Than One Year

If storing PCB wastes and/or containers for more than one year, you would need both a California Hazardous Waste Facility permit and special permission from U.S. EPA (40 CFR 761.65).

If you store PCB wastes for disposal for more than 30 days, does the storage location meet the criteria as listed below (40 CFR 761.65)?

Physical Storage Criteria for a PCB Storage Area

- Adequate roof and walls to prevent rainwater from reaching the stored PCBs and PCB items.
- An adequate floor, which has continuous curbing with a minimum of six inch curb. The floor and curbing must provide a containment volume equal to at least two times the internal

volume of the largest PCB articles or PCB container or 25% of the total internal volume of all PCB articles or PCB containers stored therein, whichever is greater.

- No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area.
- Floors and curbing constructed of continuous smooth impervious materials, such as Portland cement concrete or steel, to prevent or minimize penetration of PCBs.
- Not located at a site that is below the 100-year flood water elevation.

5. Spills

Have all PCB spills and leaks been cleaned up in a timely manner and the appropriate agencies been notified (40 CFR 761.125)?

Yes

Spills of PCBs can vary from transformer drips to large spills that pose an immediate threat to public health and safety. The important issues regarding spills and compliance are 1) cleanup and 2) timely reporting of the spills. Cleanup levels vary depending on the location of the spill, type of surface involved, concentration of PCBs, future use of the property, etc. Reporting requirements for spills can be as soon as within 24 hours of the spill (40 CFR 761.125).

6. PCB Transformers and Capacitors

If you have PCB Transformers and/or PCB high or low voltage capacitors (either in use, storage for reuse, or storage for disposal), are they in a location that does not pose an exposure risk to food or feed (40 CFR 761.30)?

Yes

Have all network PCB transformers been removed from locations that are in or near commercial buildings and have radial transformers been fault protected (40 CFR 761.30)? **Yes**

If you are still using PCB high or low voltage large capacitors, are they being used within a restricted-access electrical substation or in a contained and restricted-access indoor installation (40 CFR 761.30)?

Yes

If you have PCB Transformers still in use, have you notified EPA of their location (40 CFR 761.30)? **Yes**

7. Miscellaneous

Have you avoided servicing or rebuilding any electromagnet, switch or voltage regulator with a PCB concentration ≥ 500 ppm that would require the removal and rework of the internal components (40 CFR 761.30)? **Yes**

Have you avoided using waste oil with a PCB concentration \geq 2 ppm as a sealant, coating, or dust control (40 CFR 761.30)? **Yes**